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5 Attorneys for Defendant
6 PRAVEEN CHAKRAVARTY

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

12 THOMAS WEISEL PARTNERS LLC, a
13 Delaware limited liability company, and
14 THOMAS WEISEL INTERNATIONAL
15 PRIVATE LIMITED, an Indian company,

Plaintiffs,

16 v.
17 BNP PARIBAS, a French corporation, BNP
18 PARIBAS SECURITIES (ASIA) LIMITED,
19 a Hong Kong company, and PRAVEEN
CHAKRAVARTY, an individual,

Defendants.

Case No. 3:07-cv-06198-MHP

**STIPULATED REQUEST FOR AN ORDER
EXTENDING DISCOVERY DEADLINES AND
[PROPOSED] ORDER (Local Rule 6-2)**

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1 Pursuant to Civil Local Rule 6-2, IT IS HEREBY STIPULATED by and between the
 2 parties hereto through their respective attorneys of record that, if the Court approves, the current
 3 discovery deadlines in the above-captioned case be extended as set forth below. The stipulation
 4 is based on the following:

5 1. The parties have not yet completed depositions. Several factors have contributed
 6 to the parties' inability to complete depositions by the current deadline of September 30, 2009.
 7 First, scheduling depositions in this case has required greater than usual coordination of parties'
 8 schedules because of the international travel required for all of the defendants' witnesses, which
 9 has included obtaining of visas and coordinating trips spanning over several days. Second,
 10 counsel for defendant Chakravarty filed a substitution of counsel on or about August 27, and has
 11 needed some additional time review tens of thousands of pages of documents in order to get up
 12 to speed in the case. Third, the parties had continuously worked in an attempt to resolve several
 13 disputes regarding the production of documents which pertain to the percipient witness
 14 depositions in this case.

15 2. Because of these facts, the parties have been unable to complete all fact witness
 16 depositions by the current deadline of September 30, 2009. Accordingly, the parties request a
 17 43-day extension—to November 13, 2009—of the current deadline to complete percipient
 18 witness depositions. During the proposed extension period, Plaintiffs anticipate completing the
 19 party depositions of Praveen Chakravarty, Phillippe Ditisheim, and Defendants BNP Paribas and
 20 BNP Paribas Securities (Asia) Limited. Defendants anticipate completing the party depositions
 21 of Mark Fisher, Thomas Weisel, Keith Gay, Plaintiffs Thomas Weisel and Thomas Weisel
 22 International Private Limited, and non party depositions of KV Dhillon, David Baylor, and
 23 Mike McCarthy.

24 3. The change in deadline to depose percipient witnesses necessitates a change in the
 25 deadline for the exchange of expert reports (from October 30, 2009 to December 9, 2009) and to
 26 exchange expert rebuttal reports (from November 30, 2009 to January 11, 2009).

27 4. The parties have previously requested only one extension to Court-ordered

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1 deadlines. The proposed extensions to the discovery deadlines will not affect the close of expert
 2 discovery or close of fact discovery deadlines, the deadline to hear motions or the trial date set
 3 by the Court.

4 5. The current schedule and the proposed revised schedule that the parties have
 5 stipulated to are shown in the chart below.

| 6 Pretrial Deadline 7 | 8 Current Schedule | 9 Stipulated Proposed 10 Schedule |
|---|--------------------|--------------------------------------|
| Last day for percipient witness depositions | 9/30/09 | 11/13/09 |
| Exchange of expert reports | 10/30/09 | 12/9/09 |
| Exchange of expert rebuttal reports | 11/30/09 | 1/11/10 |
| Close of expert discovery | 12/31/09 | 1/29/10 |
| Discovery cut-off | 1/29/10 | 1/29/10 |
| Deadline to hear motions | 3/15/10 | 3/15/10 |
| Trial | 5/11/10 | 5/11/10 |

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16 6. The parties respectfully request that the Court grant their request.

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19 Dated: October 2, 2009

DURIE TANGRI LLP

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By: /s/Johanna Calabria

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Johanna Calabria

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Attorneys for Defendant PRAVEEN CHAKRAVARTY

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DAVIS WRIGHT TERMAINE LLP

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By: /s/Joseph E. Addiego III

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Joseph E. Addiego III

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28

1 -and-

2 CLIFFORD CHANCE US LLP

3 By:/s/Steven T. Cottreau

4 Steven T. Cottreau

5 Attorneys for Defendants
6 BNP PARIBAS and BNP PARIBAS SECURITIES
7 (ASIA) LIMITED

8 HOWARD RICE NEMEROVSKI CANADY FALK &
9 RABKIN

10 By: /s/Gilbert Serota

11 Gilbert Serota

12 Attorneys for Plaintiffs
13 THOMAS WEISEL PARTNERS LLC and
14 THOMAS WEISEL INTERNATIONL PRIVATE
15 LIMITED

16 **FILER'S ATTESTATION**

17 Pursuant to General Order No. 45, Section X (B) regarding signatures, I, Johanna
18 Calabria, attest that concurrence in the filing of this document has been obtained.

19 _____
20 /s/ Johanna Calabria

21 Johanna Calabria

22 IT IS SO ORDERED:

23 Dated: October 5, 2009 .

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25 _____

26 Hon. Marilyn Hall Patel
27 United States District Judge

CERTIFICATE OF SERVICE

I certify that all counsel of record are being served on October 2, 2009 with a copy of this document via the Court's CM/ECF system.

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By: /s/ Johanna Calabria

Johanna Calabria

Attorneys for Defendant Praveen Chakravarty